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Of Attorneys for State Defendants Hormann,  
Krings, Riddle, Wilcox and Oregon State Police

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Plaintiffs,

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, ESTATE  
OF DAVID E. HALL, VIDOCQ SOCIETY,  
CITY OF COQUILLE, CITY OF COOS  
BAY, and COOS COUNTY,

Defendants.

Case No. 6:20-cv-1163-MTK (Lead Case)  
3:21-cv-1719-MTK (Trailing Case)

DECLARATION OF JESSE B. DAVIS IN  
SUPPORT OF STATE DEFENDANTS  
MOTION FOR SUMMARY JUDGMENT

VIDOCQ SOCIETY,

Cross-Claimant.

RICHARD WALTER,

Cross-Claimant.

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NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian ad litem, on behalf  
of S.M., a minor,

Plaintiff,

v.

OREGON STATE POLICE,

Defendant.

I, Jesse B. Davis, declare:

1. I am a Senior Assistant Attorney General with the Trial Division of the Oregon, Department of Justice. I represent State Defendants Hormann, Krings, Riddle, Wilcox and Oregon State Police in this matter. I have personal knowledge of the matters set forth herein.
2. Attached hereto are Exhibits labeled and described as follows, each of which are true copies of the originals to the extent described herein:
3. Exhibit 101: Transcript of all grand jury testimony from the 2010 Coos County Coos County Grand Jury, as obtained in discovery in this matter.
4. Exhibit 102: Criminal trial transcript from *State v. McGuffin*, Coos County Case No. 10CR0782, as obtained in discovery in this matter.
5. Exhibit 103: Transcribed statement given by Plaintiff Nicholas McGuffin, June 30, 2000, as obtaining in discovery in this matter.
6. Exhibit 104: Coquille Police Department Report, July 5, 2000, as obtained in discovery in this matter.

7. Exhibit 105: Excerpt from deposition of Defendant Michael Reaves, taken in this matter.
8. Exhibit 106: **Intentionally omitted**
9. Exhibit 107: Signed stipulation of the parties filed July 7, 2011, in *State v. McGuffin*, Coos County Case No. 10CR0782 and the documents attached thereto, obtained the court's file (pages 1-23); Exhibits 207, 208, 210, 211, and 212 as received at trial pursuant to the stipulation (pages 24-37).
10. Exhibit 108: Copies of Mary Krings' bench notes, bates numbered MCCREA\_012299 to 12555, indicating they were found in the files of attorney Shaun McCrea.
11. Exhibit 109: General Judgment (Post-Conviction) in *McGuffin v. Nooth*, Malheur County Case No. 15CV1030.
12. Exhibit 110: Excerpt from deposition of Megan Davidson, taken in this matter
13. Exhibit 111: Excerpt from deposition of John Lindegren, taken in this matter
14. Exhibit 112: Coquille Police Department Report, February 6, 2010, as obtained in discovery in this matter.
15. Exhibit 113: Oregon State Police Portland Forensic Laboratory, DNA Unit Short Tandem Repeat (STR) Analysis Casework Protocol, approved August 1, 2000, as it was previously labeled and used as Exhibit 6 to the Deposition of Mary Krings in this matter
16. Exhibit 114: Coos County Sheriff's Office Incident Report July 5, 2000
17. Exhibit 115: Coquille Police Department Report July 15, 2000, as obtained in discovery in this matter
18. Exhibit 116: Maps and diagrams of the Coquille area, as received as Exhibits 2 through 6 at trial in *State v. McGuffin*, Coos County Case No. 10CR0782
19. Exhibit 117: Coos County Sheriff's Office Report dated July 5, 2000, as it was previously labeled and used as Exhibit 2 to the Deposition of Craig Zanni in this matter

20. Exhibit 118: Excerpt from deposition of Mary Krings, taken in this matter
21. Exhibit 119: Excerpt from deposition of Kathy Wilcox, taken in this matter
22. Exhibit 120: Excerpt from deposition of Shaun McCrea, taken in this matter  
December 4-5, 2023
23. Exhibit 121 Plaintiff's Supplemental Response to Defendant Kathy Wilcox's First Set of  
Interrogatories in this matter.
24. Exhibit 122: Photographs of the trunk of blue Ford Mustang, as received as Exhibits 22 to  
24 at trial in *State v. McGuffin*, Coos County Case No. 10CR0782
25. Exhibit 123: Excerpt from deposition of Susan Hormann, taken in this matter, as well as  
excerpts of Exhibits 8 and 17 as there were previously labeled in that  
deposition
26. Exhibit 124: Plaintiff's Response to Defendant Susan Hormann's First Set of  
Interrogatories in this matter.
27. Exhibit 125: **Intentionally omitted**
28. Exhibit 126: **Intentionally omitted**
29. Exhibit 127: Transcript of recording of Kristen Steinhoff interview March 4, 2010, as  
obtained in discovery in this matter
30. Exhibit 128: March 10, 2010, Analytical Report by Oregon State Police Forensic  
Laboratory, as obtained in discovery in this matter
31. Exhibit 129: March 25, 2010, Field Investigation report by Oregon State Police Forensic  
Laboratory, as obtained in discovery in this matter
32. Exhibit 130: May 24, 2010, Analytical Report by Oregon State Police Forensic  
Laboratory, as obtained in discovery in this matter
33. Exhibit 131: October 25, 2024, Expert report submitted in this matter by Marla Kaplan
34. Exhibit 132: October 10, 2017, Analytical Report by Oregon State Police Forensic  
Laboratory, as obtained in discovery in this matter

35. Exhibit 133: May 17, 2017, Amended Report by Oregon State Police Forensic Laboratory, as obtained in discovery in this matter
36. Exhibit 134: Plaintiff's Response to Defendant Mary Krings' First Set of Interrogatories in this matter
37. Exhibit 135: Excerpt from deposition of Huma Nasir, taken in this matter
38. Exhibit 136: July 9, 2024, Expert report submitted in this matter by Huma Nasir

39. Exhibit 26 to the Deposition of Chris Webley taken in this matter is a portion of the ABC program "20/20" broadcast in 2010 about the Freeman investigation. I have viewed it and will generally describe its contents in lieu of submitting it to court. Between 5:50 and 06:35 on that recording, the recording depicts Susan Hormann briefly describing some items that she tested. She says nothing about the results. The show's narrator says, "No match," and then Defendant Dannels says something to the effect of "thought this was going to be Leah's blood, and of course, it wasn't."

40. Exhibit 23 to the Deposition of Chris Webley taken in this matter is a portion of the ABC program "20/20" broadcast in 2010 about the Freeman investigation. I have viewed it and will generally describe its contents in lieu of submitting it to court. Between 7:17 and 7:23 on that recording, Dannels was interviewed and said words to the effect of Freeman's first shoe was found near the cemetery with blood on it the night Freeman disappeared.

41. I have reviewed the discovery in this matter, and in a folder with a file path ending "Law Office of Shaun McCrea\Discovery from State\McGuffin Discovery Individual Items," I located the same report and analytical notes that were labeled and used as Exhibit 18k to the deposition of Kathy Wilcox taken in this matter, indicating it had been found in Shaun McCrea's files.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED January 7, 2025.

s/ Jesse B. Davis  
JESSE B. DAVIS  
Senior Assistant Attorney General